

PLAINTIFF'S EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTIAN RUIZ BAPTISTE,

Plaintiff,

vs.

CASE NO. C-12-5209 PJH

LIDS; HAT WORLD, INC.;
GENESCO, INC.; MICHAEL
SOMOON; and DOES 1
through 5, inclusive,

Defendants.

DEPOSITION OF MICHAEL SOMOON

June 24, 2013

10:07 a.m.

Marriott Hotels & Resorts
2355 North Main Street, Santa Catalina Board Room
Walnut Creek, California

REPORTED BY:
TERRI NESTORE
CSR No. 5614

1 A. Just trying to make ends meet, not making
2 enough money, things like that.

3 Q. Anything else that made you feel bad for
4 Mr. Baptiste?

5 A. No, not too much. And to be clear, I felt a
6 little bit of empathy, but it didn't take anything away
7 from the fact that he stole from us.

8 Q. We talked about where you worked before
9 Hat World.

10 Where did you work after you were let go from
11 Hat World?

12 A. I went to a couple other big box retailers.

13 Q. What were the names?

14 A. One was OfficeMax.

15 Q. Where was the location?

16 A. San Jose.

17 Q. What did you do there?

18 A. General manager.

19 Q. Were there any complaints made at OfficeMax
20 about you allegedly violating any kind of unlawful
21 harassment or discrimination policies?

22 A. No.

23 Q. Where did you work after OfficeMax?

24 A. I went to a hardware store.

25 Q. What did you do there?

1 A. General manager.

2 Q. What was the name of the store?

3 A. Orchard Supply Hardware.

4 Q. Is that where you currently work now?

5 A. No.

6 Q. Where do you currently work now?

7 A. I work for a nonprofit organization.

8 Q. What's the name?

9 A. Right now it's currently with Goodwill
10 Industries.

11 Q. Located out of?

12 A. Silicon Valley.

13 Q. And what do you do there?

14 A. District manager.

15 Q. At any of these places we've talked about --
16 OSH, the nonprofit, we talked about OfficeMax -- any
17 kind of allegations of any conduct on your behavior that
18 may constitute unlawful harassment?

19 A. No.

20 Q. Were you terminated from any of those jobs?

21 A. No.

22 MR. DECKER: I'm going to show you an exhibit.

23 (Exhibit 5 marked)

24 BY MR. DECKER:

25 Q. It's an email chain, and it doesn't look like